

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BRANDI CRAWFORD-JOHNSON, ET AL.,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GRAPHIC PACKAGING
INTERNATIONAL, LLC,

Defendant.

Case No. 1:20-cv-00842-JTN-SJB

HON. JANET T. NEFF

**STIPULATION AND ORDER FOR AMENDMENT OF CASE MANAGEMENT
DEADLINES**

Plaintiffs and Defendant, by and through their respective undersigned counsel, hereby stipulate that certain deadlines from the Court's September 7, 2023 Case Management Order, be amended. In support of this stipulation, the Parties state as follows:

1. On September 6, 2023, the Parties appeared before the Court for a Rule 16 Scheduling Conference.

2. On September 7, 2023, the Court entered a Case Management Order, which set the following deadlines for class certification related discovery (ECF No. 72):

Rule 26(a)(1) Disclosures	NOVEMBER 3, 2023
Motions to Join Parties or Amend Pleadings	DECEMBER 1, 2023
Disclose Name, Address, Area of Expertise and Plaintiff: provide a short summary of expected testimony Defendant: of all testifying experts (Rule 26(a)(2)(A))	JANUARY 15, 2024 FEBRUARY 15, 2024
Disclosure of Expert Witness Reports (Rule 26(a)(2)(B))	Within 30 days of Rule 26(a)(2)(A) Disclosures
Supplement Voluntary Exchange of Documents	MARCH 22, 2024
Completion of Discovery (Class Certification)	APRIL 24, 2024

ADR To Take Place:	Within 60 Days of Court's Decision on Class Certification
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3. The Parties each served initial disclosures on November 3, 2023.
4. Both Parties served their first sets of written discovery requests on November 28, 2023. (ECF Nos. 76, 77). The parties are in the process of exchanging relevant documents.
5. On January 15, 2024, Plaintiff served its initial expert disclosures pursuant to Rule 26(a)(2)(A) and the Court's Case Management Order.
6. The Parties have conferred and agree that documentary and other discovery efforts will be necessary to provide fulsome expert reports, and adequately inform the experts, regarding issues related to class certification. The Parties also agree that expert depositions will be necessary prior to class certification briefing.
7. The Parties have conferred and further agree that additional time will be required to permit the Parties to fully exchange discovery, and to inform their experts with such discovery, prior to expert report submissions and briefing on the issue of class certification.
8. Further, the Parties agree that certain deadlines should be set to establish a class certification briefing schedule.
9. Accordingly, the Parties request that the Court enter a scheduling order with the following deadlines:

<u>Event</u>	<u>New Deadline</u>	<u>Prior Deadline</u>
Completion of Discovery (Class Certification)	May 24, 2024	April 24, 2024
Plaintiffs' Disclosure of Expert Witness Reports (Rule 26(a)(2)(B))	June 14, 2024	February 14, 2024
Defendant's Disclosure of Expert Witness Reports (Rule 26(a)(2)(B))	July 12, 2024	March 16, 2024
Completion of Expert Discovery (Class Certification)	August 9, 2024	N/A
Plaintiffs' Motion for Class Certification Due	August 30, 2024	N/A
Defendant's Response in Opposition to Class Certification Due	September 27, 2024	N/A

Plaintiffs' Reply in Support of Class Certification Due	October 11, 2024	N/A
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10. The Parties stipulate to the proposed amended schedule above, and neither Party will be prejudiced by the modest requested extensions and amendments to the Case Management Order.

11. As to all issues and deadlines not addressed in the proposed amended Case Management Order outlined in Paragraph 9 above, the Court's prior September 7, 2023 Case Management Order shall govern.

12. The Parties seek to document these extensions and amendments via this Stipulation and Order and respectfully request that the Court enter the below Order consistent with the Stipulation.

STIPULATED AND AGREED:

LIDDLE SHEETS COULSON, P.C.

By: /s/ Laura L. Sheets

Laura L. Sheets
Steven D. Liddle
Matthew Z. Robb
lsheets@lscounsel.com
sliddle@lscounsel.com
mrobb@lscounsel.com
Attorneys for Plaintiffs

Dated: February 19, 2024

BARNES & THORNBURG LLP

By: /s/ Anthony C. Sallah (with permission)

Charles M. Denton (P33269)
Anthony C. Sallah (P84136)
171 Monroe Avenue, NW, Suite 1000
Grand Rapids, MI 49503
P: (616) 742-3930
F: (616) 742-3999
cdenton@btlaw.com
asallah@btlaw.com

Attorneys for Defendant

Dated: February 19, 2024

ORDER

IT IS SO ORDERED.

Dated: February 20, 2024

/s/ Janet T. Neff

HON. JANET T. NEFF
United States District Judge